



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

October 4, 2021

Via ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. AT&T Inc., et al., 21 Civ. 01951 (PAE) (S.D.N.Y.)

Dear Judge Engelmayer:

Plaintiff Securities and Exchange Commission (“SEC”) and Defendants Christopher C. Womack, Kent D. Evans, and Michael J. Black (collectively, “Individual Defendants”) jointly respectfully request that the Court issue the enclosed Request for International Judicial Assistance (Letter Rogatory) (the “Request”) to the Ontario Superior Court of Justice in Toronto, Ontario, Canada. The Request seeks documents from The Bank of Nova Scotia, d/b/a Scotiabank and its subsidiary Scotia Capital Inc. – Canada (“Scotiabank”), and depositions of Scotiabank employees or former employees Jeff Fan, Moby Parkhani, and Matthew Lee (collectively, “Prospective Deponents”). Scotiabank and the Prospective Deponents have within their knowledge, possession, custody, or control evidence that is highly relevant to the claims and defenses in this litigation. Defendant AT&T, Inc. does not oppose this request.

Respectfully submitted,

/s/ Victor Suthammanont

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cc: All Counsel of Record (via ECF)